IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

JENNIFER BURKE, PH.D.,	§	
Plaintiff,	§	CIVIL ACTION
•	§	
VS.	§	NO. 4:11-CV-01749
	§	
PRAIRIE VIEW A&M UNIVERSITY,	§	
DR. GEORGE C. WRIGHT, in his	§	JURY TRIAL DEMANDED
capacity as President of Prairie View	§	
A&M University; DR. E. JOAHANNE	§	
THOMAS-SMITH, in her capacity as	§	
Provost and Senior Vice President for	§	
Academic Affairs of Prairie View A&M	§	
University; DR. DANNY R. KELLEY, in	§	
his capacity as Dean of the College of Arts	§	
and Sciences at Prairie View A&M	§	
University	§	
Defendants.	-	

EXHIBIT "C" AMENDED PLAINTIFF'S WITNESS LIST

NO	WITNESS	PARTY/KNOWLEDGE	CALL AT TRIAL
1	Jennifer Burke	Plaintiff. Dr. Burke	Yes/Will Call
	c/o Gaines West		
	West, Webb, Allbritton & Gentry, P.C.		
	1515 Emerald Plaza		
	College Station, Texas 77845		
	979-694-7000		
2	Dennis Burke	Plaintiff's spouse.	May Call
	Spring, TX 77381		
3	Representative of Prairie View A&M	Defendant	Yes/Will Call
	University		
	c/o William T. Deane		
	Assistant Attorney General		
	General Litigation Division		
	P.O. Box 12548, Capitol Station		
	Austin, Texas 78711-2548		
4	Dr. George C. Wright	Defendant	Yes/Will Call
	c/o William T. Deane		
	Assistant Attorney General		

NO	WITNESS	PARTY/KNOWLEDGE	CALL AT TRIAL
	General Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548		
5	Dr. E. Joahanne Thomas-Smith c/o William T. Deane Assistant Attorney General General Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548	Defendant	Yes/Will Call
6	Dr. Danny R. Kelley, DMA c/o William T. Deane Assistant Attorney General General Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548	Defendant	Yes/Will Call
7.	Mr. Albert Gee Human Resources Mail Stop 1337 P.O. Box 519 Prairie View, Texas 77446 (936) 261-1730 (936) 261-3311 (general)	Mr. Gee is an Assistant Vice President for Human Resources, Prairie View A&M University. Has knowledge regarding Plaintiff's employment with Defendant, and Plaintiff's FMLA leave.	May Call
8	Dr. Dejun Liu Languages & Communications Mail Stop 2220 P.O. Box 519 Prairie View, Texas 77446 (936) 261-3731 (936) 261-3311 (general) deliu@pvamu.edu	Associate Professor of Prairie View A&M University, Former Chair of the Department of English and Communications. Has knowledge regarding Plaintiff's employment with Defendant.	Yes/May Call
9	Mr. Ozzie Banaki	Former Faculty Member Prairie View A&M University. May have knowledge of discrimination at Prairie View A&M University.	May Call
10	Mr. Robert K. Benson Prairie View, Texas 77446-0835	Lecturer in the Department of Communications, Prairie View A&M University.	May Call

NO	WITNESS	PARTY/KNOWLEDGE	CALL AT TRIAL
		Has knowledge of Dr. Burke's illness, as well as her employment with Prairie View A&M University.	
11	Mr. Jose Briceno, Union Representative Texas Faculty Association 316 W. 12 th St. Austin, TX 78701 1 (800) 364-8452 1 (877) 275-8782	Has knowledge of the discrimination experienced by Plaintiff	May Call
12	Dr. Hariettte Howard-Lee Block Department of Biology New Sciences Bldg Mail Stop 2210 P.O. Box 519 Prairie View, Texas 77446-0835 (936) 261-3175 (936) 261-3311 (general)	Chair of Prairie View A&M University Tenure Committee.	May Call
13	Dr. George Brown Department of Biology New Sciences Bldg Mail Stop 2210 P.O. Box 519 Prairie View, Texas 77446 936-261-3164 (936) 261-3311 (general) gebrown@pvamu.edu	Distinguished Professor, Speaker of Prairie View A&M University Faculty Senate. Has knowledge of Prairie View A&M University Faculty Salaries.	May Call
14	Dr. Shannan Butler Assistant Professor, St Edwards University	Has knowledge of the racially hostile environment at Prairie View A&M University. Was involved in recruiting Dr. Burke to Prairie View A&M University.	Yes/May Call
15	Dr. Diljit K. Chatha Languages & Communications Mail Stop 2220 P.O. Box 519 Prairie View, Texas 77446 936.261.3715 (936) 261-3311 (general)	Regents Professor of English, Director of Graduate English, Prairie View A&M University .A member of the Departmental Tenure and Promotion Committee. Has	May Call

NO	WITNESS	PARTY/KNOWLEDGE	CALL AT TRIAL
	dkchatha@pvamu.edu	knowledge of discrimination at Prairie View A&M University.	
18	Dr. Natalie Hrintonenko Mathematics Department Mail Stop 2225 P.O. Box 519 Prairie View, Texas 77446 (936) 261-1978 (936) 261-3311 (general) nahritonenko@pvamu.edu	Professor at Prairie View A&M University. Member of the Tenure Appeal Committee.	May Call
19	Dr. Antonio Jocson Languages & Communication Mail Stop 2220 P.O. Box 519 Prairie View, Texas 77446 (936) 261-3716 (936) 261-3311 (general) aljocson@pvamu.edu Associate Professor of English	Has knowledge of Plaintiff's employment with Defendant; has knowledge of the policies surrounding Tenure and Promotion at Prairie View A&M University. Member of Departmental Tenure and Promotion Committee.	May Call
20	Dr. Ymitri Mathison Languages & Communications Mail Stop 2220 P.O. Box 519 Prairie View, Texas 77446 (936) 261-3714 (936) 261-3311 (general) ymathison@pvamu.edu	Associate Professor, Prairie View A&M University. Has knowledge of Plaintiff's employment with Defendant, was chair of the Departmental Tenure and Promotion Committee	May Call
21	Dr. Melinda McBee,	Former Prairie View A&M University professor who has knowledge of discriminatory treatment toward white female employees at Prairie View A&M University.	May Call
22	Dr. Kenneth Lachlan Communications Director, University of Massachusetts (617) 287-6770	Has knowledge of Dr. Burke's research.	May Call
23	Dr. Pamela Obiomon EE Bldg. Rm.330 Mail Stop 2520 P.O. Box 519	Associate Professor at Prairie View A&M University Member of the Tenure Appeal Committee	May Call

NO	WITNESS	PARTY/KNOWLEDGE	CALL AT TRIAL
	Prairie View, Texas 77446 (936) 261-9907 (936) 261-3311 (general) phobiomod@pvamu.edu		
24	Dr. James Palmer, Current Chair Languages & Communications Mail Stop 2220 P.O. Box 519 Prairie View, Texas 77446 jmpalmer@pvamu.edu (936) 261-3311	Has knowledge of Dr. Burke's research.	May Call
25	Ms. Kim Spacek Harrington Science Bldg Rm. 109 Mail Stop 1337 P.O. Box 519 Prairie View, Texas 77446 (936) 261-1730 (936) 261-3311 (general)	Human Resources Leave Coordinator, Prairie View A&M University. Has knowledge regarding Plaintiff's FMLA leave.	May Call
26	Dr. Patric Spence Communications Department Kalamazoo, MI 49008-5200 (269) 387-1000 patric.spence@wmich.edu	Assistant Professor, Western Michigan University. Has knowledge of Dr. Burke's research.	May Call
27	Mrs. Rebecca Stanley Harrington Science Bldg Rm.109 Mail Stop 1337 P.O. Box 519 Prairie View, Texas 77446 (936) 261-1730 (936) 261-3311 (general)	Human Resource Benefits Coordinator, Prairie View A&M University. Has knowledge regarding Plaintiff's FMLA leave	May Call
28	Dr. Dhadesugoor R. Vaman P.O. Box 519 Prairie View, Texas 77446 Mail Stop 2520 (936) 261-9901 (936) 261-3311 (general) drvaman@pvamu.edu .	Distinguished Professor at Prairie View A&M University Member of the Tenure Appeal Committee	May Call
29	Sarah Wakefield, Ph.D. Languages & Communications Hilliard Hall Ste 213	Has knowledge of Plaintiff's employment with Defendant, the Prairie View A&M	May Call

NO	WITNESS	PARTY/KNOWLEDGE	CALL AT TRIAL
	Mail Stop 2220 P.O. Box 519 Prairie View, Texas 77446 (936) 261-3726 (936) 261-3311 (general) srwakefield@pvamu.edu Associate Professor, Prairie View A&M University	University tenure process, and the qualifications of others who have obtained tenure.	
30	Dr. Corrinne Weisgerber Assistant Professor, St. Edwards University	Has knowledge of the racially hostile environment at Prairie View A&M University. Was involved in recruiting Dr. Burke to Prairie View A&M University.	Yes/May Call
31	Dr. Charles Wukasch, accprof@att.net Adjunct Faculty Member, Austin Community College (512) 288-5362 .	Has knowledge of discrimination at Prairie View A&M University	Yes/May Call
32	Dr. Michael Di Teresa, MD Internist, General Practioner 425 Holderrieth Blvd Ste. 209 Tomball, TX 77375 (281) 357-8885	Has knowledge of Plaintiff's medical conditions.	May Call
33	Patricia Stevens, MD FM 1960 Pediatric Center 8111 Cypresswood Dr, Ste 104 Spring, Texas 77379	Has knowledge of Plaintiff's childrens' illnesses	May Call
34	Dr. William Reading, MD Psychiatrist 12603 Southwest Fwy Ste. 510 Stafford, Texas 77477 (281) 494-4471	Has knowledge of Plaintiff's mental anguish	May Call
35	Dr. Patrick Woods, MD Methodist Willowbrook Hospital Emergency Care Center 18220 Tomball parkway Houston, TX 77070 (281) 737-1000	Has knowledge regarding Plaintiff's FMLA leave.	May Call

NO	WITNESS	PARTY/KNOWLEDGE	CALL AT TRIAL
36	Dr. Marlon White, MD Obstetrics & Gynecology Northwest Women's Center 13215 Dotson Road ste200 Houston, TX 77070 (281) 555-3440	Obstetrician; Has knowledge of Plaintiff's pregnancy and FMLA leave	May Call
37	Dr. Timothy N. Hickman, MD Obstetrics & Gynecology Reproductive Endocrinology 920 Frostwood Dr. Ste. 570 Houston, TX Has knowledge of Plaintiff's pregnancy.	Has knowledge of Plaintiff's pregnancy.	May Call
38	Donald R. Deere, Ph.D. Welch Consulting 1716 Briarcrest Drive, Suite 700 Bryan, Texas 77802 (979) 846-0303	Dr. Deere will testify on behalf of Dr. Burke concerning damages resulting from the denial of tenure and termination from Prairie View A&M University effective August 31, 2010. These damages include the value of the lost earnings and benefits Dr. Burke would have received over her remaining work life had she been granted tenure with Prairie View A&M University.	Yes/Will Call
39	Gaines West, Esq. West, Webb, Allbritton & Gentry, P.C. 1515 Emerald Plaza College Station, Texas 77845 979-694-7000	Mr. West will testify that the fees incurred in the prosecution of this case and the prior administrative matters are reasonable and necessary.	Yes/Will Call
40.	Baili B. Rhodes West, Webb, Allbritton & Gentry, P.C. 1515 Emerald Plaza College Station, Texas 77845 979-694-7000	Ms. Rhodes will testify that the fees incurred in the prosecution of this case and the prior administrative matters are reasonable and necessary.	Yes/ Will Call

Plaintiffs reserve the rights to call any witness designated by Defendants and reserves the right to call rebuttal witnesses.

Respectfully submitted,

WEST, WEBB, ALLBRITTON & GENTRY, P.C. 1515 Emerald Plaza College Station, Texas 77845-1515 Telephone ~ (979) 694-7000 Facsimile ~ (979) 694-8000

By: /s Gaines West

GAINES WEST

ATTORNEY-IN-CHARGE

Texas State Bar No. 21197500 Southern District No.: 5327

E-mail: gaines.west@westwebblaw.com

BAILI B. RHODES

Texas State Bar No.: 24065969 Southern District No.: 1045844

E-mail: baili.rhodes@westwebblaw.com

ATTORNEYS FOR PLAINTIFF

JENNIFER BURKE

CERTIFICATE OF SERVICE

I hereby certifies that a true and correct copy of the foregoing instrument has been sent by email notification upon filing with the Southern District via Pacer Court Notification to the counsel listed below on February 11, 2013:

William T. Deane ECF and email: bill.deane@texasttorneygeneral.com
Assistant Attorney General and amy.penn@texasattorneygeneral.com
Assistant Attorney General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548

/s Gaines West_	
Gaines West	